

United States District Court for the District of Puerto Rico

FORM A

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\/O	*		CIVIL NO.	
	Plaintiff *			
VS.	*			
	Defendant(s) *		FORECLOSURE OF MORTGAGE	
			TOREGEOGGIE OF MICHTOAGE	
	COMPLAINT			
	Plaintiff(s), by the undersigned attorney(s) allege(s) as follows: I. (Jurisdictional allegations)			
	2. On , for value received, signed and delivered to and interest at per annum, to be paid in consecutive monthly installments of , the first of which became due on before			
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	Notary , deed number .			
	3. The plaintiff is at present the owner and holder of said note.			
	4. For the purpose of securing the payment or the principal of said note, plus the addition			
	sum of \$ for interest, plus the sum of \$ for cos			
	disbursement and attorney's fees, the debtor executed a mortgage upon the following property (SEE EXHIBIT ATTACHED)			
	5. Said mortgage was duly		in the Registry of	
	Property of	at page	,volume of	
	, Puerto Rico, estate number	1 3	inscription	
	, where it still, at this time, appears in full force	e.	, ,	
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	6. It was expressly stipulated that if any one or more of the installments of the mortgage should become due and not paid, then the whole outstanding balance of the debt would be due and payable.			
	7. The following installments have become due and have not been paid by the defendant(s) nor by any other party on (their) (his) (her) (its) behalf: installments due for the months of to , I9, both inclusive, in the sum of \$ each, for principal, interest, and escrow deposit.			
	8. There is still owing to plaintiff the amplus interest at % per annum from	nount of \$	principal, to date of full payment.	

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WHEREFORE, plaintiff demands judgment as follows:
(a) That defendant(s) pay to plaintiff the sum of \$ principal, interest at the rate of % per annum, at the daily accrual rate of \$ from until full payment, any disbursements made by the plaintiff on behalf of the defendant(s) in accordance with the mortgage deed, plus \$ for costs, disbursements and attorney's fees, plus any other advances, made by the plaintiff.
(b) Or in default thereof that the property described in paragraph four (4) hereinabove be sold at public auction and that the money due to plaintiff be paid from the proceeds of the sale.
San Juan, Puerto Rico, this day of, l9